EXHIBIT 68-21



Dimitrov vs Stavatti Aerospace

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

Valentino Dimitrov, individually and on behalf of all others similarly situated,)))
Plaintiff,)
VS.) Case No.) 2:23-CV-00226-PHX-DJH
Stavatti Aerospace, Ltd, a Minnesota corporation, et al.,)
Defendants.))

VIDEOCONFERENCE DEPOSITION OF JOHN SIMON

Phoenix, Arizona January 21, 2025 9:18 a.m.

REPORTED BY: TERESA A. WATSON, RMR Certified Reporter Certificate No. 50876

PREPARED FOR: ASCII/Condensed

(Certified Copy)



Dimitrov vs John Simon

Stavatti Aerospace

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1 could be American allies or NATO members.

- could be American arries of NATO members
- 2 BY MR. CHEBAT:
- Q. Is there a designated design and engineering team at
- 4 | Stavatti?
- 5 A. Sorry?
- Q. Is there a designated design and engineering team at
- 7 | Stavatti?
- 8 A. Well, that's primarily Chris Beskar.
- 9 Q. Chris Beskar provides all design and engineering
- 10 | services to the organization?
- 11 A. Thus far that is my understanding.
- 12 Q. Are you aware of any other third parties that he may
- 13 work with for design and engineering?
- 14 A. No.
- Q. Has Stavatti produced any revenue through presales of
- 16 any commercially marketable aerospace or aviation product?
- 17 A. I believe that we did receive a check for a couple
- 18 thousand dollars for one of our sport aircraft. As a deposit.
- 19 O. And who provided that check?
- 20 A. Goodness, I don't know. I'm sorry. That was years
- 21 ago.
- Q. How much was that check for?
- 23 A. Several thousand dollars. Couple thousand dollars.
- Q. What value is a couple?
- 25 A. Again, I don't remember.



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- 1 O. And was that aircraft ever built?
- 2 A. Not yet.
- Q. And has Stavatti built any aircraft to date?
- 4 A. I don't know that. Not during my tenure.
- Q. Are you aware of a Vice article that refers to
- 6 | Stavatti as a company that's never made a plane?
- 7 A. I've read articles on the internet. It may have been 8 one of them.
- 9 Q. What's your understanding of Stavatti's current 10 financial situation?
- A. We intend -- we have debt, and we intend to pay that debt. It's my understanding we intend to also make good any type of investment that was made, or loan in the case of what I understand Mr. Dimitrov has with Stavatti, to pay that back.
- 15 Q. And who are the debt holders of Stavatti?
- A. I know Mr. Dimitrov is. I don't know anybody else. I
 don't have a list of the debtors to Stavatti. I don't keep
 track of that money, that monetary information.
- Q. Earlier you mentioned that David Kim, Dr. Kim, had a lien on the property. What was that for?
- A. Yes. He made a loan, as you said, for a certain amount of money.
- Q. So is he a debt holder of the Stavatti organization?
- 24 A. I believe so. Yes.
- 25 Q. And is there any other individuals who are debt



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0 And is surrent intent for these protetypes to be built

- Q. And is current intent for those prototypes to be built in -- is the current intent for the prototypes to be built in western New York?
- A. Most likely, yes. And I say most likely, yes, because it depends what -- the size and the actual prototype itself.

 Some prototypes can be built in a smaller facility. And we don't have a smaller facility, but they could be built in a
- 9 Q. But to date, to your knowledge, since the company's
- A. Since I've been involved, yes.

founding, it has not created a prototype?

- Q. There was early mention of a possible acquisition with the Ukrainian government for \$192 million. What came of that initiative?
- 15 A. I don't know.

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Q. Were you aware of that purchase contract?

smaller facility or a large one needs our site.

- 17 A. Yes. And the possibility of it happening. It never 18 happened.
- Q. Are you aware of any large purchase agreement for any aircraft from Stavatti from a third party?
- A. We've had mention at those general meetings, a variety of different opportunities.
- Q. Have any of those opportunities ever manifested?
- A. Not yet.
- Q. And when do you expect the first of these



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    STATE OF ARIZONA
                              SS.
 2
    COUNTY OF MARICOPA
                        )
 3
              BE IT KNOWN that the foregoing proceedings were taken
 4
    before me; that the witness before testifying was duly sworn by
 5
    me to testify to the whole truth; that the foregoing pages are a
    full, true and accurate record of the proceedings, all done to
    the best of my skill and ability; that the proceedings were
 6
    taken down by me in stenographic shorthand and thereafter
 7
    reduced to print under my direction.
              I CERTIFY that I am in no way related to any of the
   parties hereto, nor am I in any way interested in the outcome
 9
    hereof.
10
              [x] Review and signature was requested; any changes
    made by the witness will be attached to the original transcript.
              [ ] Review and signature was waived/not requested.
11
              [ ] Review and signature not required.
12
              I CERTIFY that I have complied with the ethical
    obligations set forth in ACJA 7-206(F)(3) and ACJA 7-206
13
    J(1)(g)(1) and (2).
14
              DATED at Phoenix, Arizona, this 21st day of February
15
    2025.
16
                                    /s/ Teresa A. Watson
17
                                   TERESA A. WATSON, RMR
                                   Certified Reporter
18
                                   Certificate No. 50876
19
20
21
              I CERTIFY that GRIFFIN GROUP INTERNATIONAL has
    complied with the ethical obligations set forth in ACJA 7-206
    (J)(1)(g)(1) through (6).
22
23
                                    /s/ Pamela A. Griffin
24
                                   GRIFFIN GROUP INTERNATIONAL
                                   Registered Reporting Firm
                                   Arizona RRF No. R1005
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